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August 1, 2008

VIA FAX AND U.S. MAIL

Mr. Robert T. Hanlon  
Robert T. Hanlon & Associates, P.C.  
14212 Washington Street  
Suite 200  
Woodstock, Illinois 60098

Re: Barker, et al. v. Local 150  
No. 08 C 50015

Dear Mr. Hanlon:

In accordance with Judge Mahoney's request of July 23, 2008, and in response to your letter of July 25, 2008, the following individuals are currently available for depositions as listed below. Please keep in mind, however, that those who want to retain their own counsel will have additional scheduling problems to consider.

<b>Charles August</b>	Available:	September 11, 2008 September 23, 2008
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Pursuant to correspondence dated July 24, 2008 from Gummerson & Rausch, it is my understanding that Mr. Charles August and his counsel are available September 11<sup>th</sup> or September 23, 2008 as of the date of that letter.

<b>Nicholas Cline</b>	Available any date after August 18, 2008, upon two (2) weeks notice.
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Please be advised that Mr. Cline is not employed by Local 150 and makes his living in Indiana. It is therefore likely that you will need to compensate him for any lost wages if you plan to depose him outside the 100 mile limits of the Northern District of Illinois.

<b>Joe Farrell</b>	Available any date except:	August 6, 2008 (a.m.) August 18, 2008 (a.m.) August 19, 2008
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<b>Ryan Drew</b>	Available any date after:	August 18, 2008
<b>Mike Aprile</b>	Available any date after:	August 12, 2008
<b>Stanley Simrayh</b>	Available any date after:	August 12, 2008
<b>Carl McCaffrey</b>	Available any date after:	August 12, 2008
<b>Robert Klotz</b>	Available:	August 19, 2008 September 3, 2008 September 4, 2008 September 10, 2008 September 11, 2008

Please be advised that Mr. Klotz is employed by the Midwest Operating Engineers Fringe Benefit Funds. Any deposition of him must be coordinated with MOE Fund counsel, Stephen J. Rosenblat, of the law firm of Baum, Sigman, Auerbach & Neuman, Ltd. Reach him at (312) 236-4316.

Please provide me with mutually agreeable dates for these depositions at your earliest convenience so that I may continue to facilitate same. If necessary, we can arrange for you to utilize the Local 150 Union Hall in Countryside for these depositions.

Very truly yours,

UOE, LOCAL 150, AFL-CIO  
LEGAL DEPARTMENT

Dale D. Pierson  
General Counsel

DDP:lmk



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LOCAL UNION No. 150  
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cc: James Sweeney  
Charles August  
Nicholas Cline  
Joe Farrell  
Ryan Drew  
Mike Aprile  
Stanley Simrayh  
Carl McCaffrey  
Robert Klotz  
Stephen J. Rosenblat, Esq.